UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,

v.

Case No. 1:19-cr-92

PERTOSKIE WILLIAMS,

Hon. Leonie M. Brinkema

Hearing: August 7, 2020

Defendant.

## POSITION OF THE UNITED STATES WITH RESPECT TO PETITION ON SUPERVISED RELEASE

The United States of America, through undersigned counsel, hereby files this Position with Respect to the pending Petition on Supervised Release. The petition alleges a Grade C violation of the terms of the defendant's supervised release; specifically, the petition alleges that the defendant left the Salvation Army's residential substance abuse program after engaging in an argument with a staff member, and thus failed to complete the program as required by this Court's March 23, 2020 Order.

The government has discussed the matter with the defendant's supervising probation officer, Senior United States Probation Officer Kimberly Hess, and understands from those discussions that since the defendant left the program, he has since enrolled in another substance abuse treatment program at which he has made significant progress. As evidence of the defendant's recent steps forward, the Probation Office informed the government that the defendant's several most recent urine samples have tested negative for controlled substances. The Probation Office indicated that it would recommend that the Court find the defendant in violation of the terms of supervised release, but order that the current terms and conditions of the defendant's supervised release remain unchanged. Under the circumstances, the government joins the Probation Office's recommended disposition, and recommends that the Court find the defendant in violation and maintain the currently-imposed conditions of supervision, together with the imposition of any additional term of supervised release the Court may deem appropriate.

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

Date: August 5, 2020 By: \_\_\_\_\_/s/

Seth Schlessinger
Assistant United States Attorney
United States Attorney's Office
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, Virginia 22314

Phone: (703) 299-3700 Fax: (703) 299-3980

Seth.Schlessinger@usdoj.gov

## CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2020, I caused a copy of the foregoing memorandum to be filed with the Clerk of Court using the CM/ECF system, which will automatically generate a Notice of Electronic Filing (NEF) to all counsel of record.

/s/

Seth Schlessinger Assistant United States Attorney